

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: (b) (5)
Date: Wednesday, July 11, 2018 10:09:00 PM
Attachments: (b) (5)

Hi there,

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Next up: your recusals. But that's something that I'll be getting from Shannon Griffo (one of the OGC/Ethics lawyers) tomorrow morning.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Bodine, Susan](#); [Breen, Barry](#); [Brooks, Phillip](#); [Darwin, Henry](#); [Goldman, Lisa](#); [Kelley, Rosemarie](#); [Leopold, Matt](#) (OGC); [Michaud, John](#); [Ross, David P](#); [Shaw, Betsy](#); [Sheehan, Charles](#); [Starfield, Lawrence](#); [Stein, Kathie](#); [Traylor, Patrick](#); [Wright, Peter](#)
Bcc: [Clarke, Victoria](#); [Keith, Jennie](#)
Subject: Ethics advice concerning your invitation to the ELI dinner
Date: Wednesday, July 10, 2019 12:50:00 PM

Hi there,

OGC/Ethics understands that you have received or will soon receive an invitation from the Environmental Law Institute (ELI) to be its guest at its annual awards dinner to be held this year on October 22, 2019 at the Omni Shoreham Hotel in Washington, DC. I am writing to confirm that, if you decide to attend this event, you may do so consistent with the Standards of Ethical Conduct for Employees of the Executive Branch.

This event qualifies for the Widely-Attended-Gathering gift exception and the donor is not a federally registered lobbyist. Thus, OGC/Ethics determines that your attendance at the event is in the Agency's interest because it will further agency programs and operations. Should you attend this event, you will NOT be required to report this as a gift on your financial disclosure report form because the gift is valued at \$200, which is BELOW the reporting threshold.

This approval applies only to invitations from ELI itself. Any invitations from other sources will require separate determinations by either OGC or the appropriate Deputy Ethics Official. This determination covers you only -- the invitation is not transferable and is not intended for more than just one attendee.

Acceptance of Free Attendance to a Dinner and Fundraiser (WAG rule)

The gift offered is an evening reception and dinner sponsored by ELI. Because the organization is offering you a complimentary ticket, we must analyze it according to the gift rules. Generally, federal employees are prohibited from accepting gifts given because of their official position or given by a prohibited source (typically, a person either regulated by or seeking to do business with the EPA). In this instance, the gift of free attendance is offered to you because of your official position. In analyzing the situation, we determined that the WAG exception is available because the reception will be widely attended, there will be a diversity of views represented, and there is an opportunity for the exchange of ideas. In order to utilize this gift exception, OGC/Ethics must also make a written determination that we believe your attendance is in the Agency's interest. We do, in fact, conclude that there is an Agency interest in your attendance if you wish to go.

Limitations Due to the Fundraiser Event

Please note that this event is a fundraiser. Therefore, ELI cannot use or reference your official position or title or any authority associated with your public office in furtherance of the

fundraising effort. You may not actively or visibly participate in the promotion, production, or presentation of the event, which means that you cannot sit at a head table nor stand in a receiving line. We have confirmed with ELI that you will be placed by ELI and not seated at the request of any sponsoring entity that has bought a table.

Please let me know if you have any questions.

Regards,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: FW: Tribal Forum Speaker Gift
Date: Monday, August 20, 2018 6:26:00 PM
Attachments: [IMG_0001.jpg](#)
[ATT00001.txt](#)

Hi there,

Thank you for showing me the actual item, and I concur that its value is below \$20. Thus, you may keep it pursuant to 5 CFR 2635.204(a). Enjoy!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: Wright, Peter
Sent: Friday, August 17, 2018 8:45 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Tribal Forum Speaker Gift

Justina

I spoke at the Tribal Land and Environmental Forum earlier this week. Each of the speakers on the plenary panel was given a similar cloth pursue as a gift for speaking. I would guess it would have cost under \$10 although it is not something I would purchase for myself. Please advise about it appropriate disposition.

Thank you

Peter



From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: Here's the draft
Date: Tuesday, July 24, 2018 2:23:00 PM
Attachments: [Peter Wright recusal \(b\) \(5\).docx](#)
[Dow Dupont Revised 6-18-2018 - Final \(004\).xlsx](#)

Hi Peter,

I apologize for my delay in getting this to you, but as I indicated, (b) (6)
(b) (6) I've been out of the office a few days and
have not been able to review this draft to get it to you. That said, I know that you have
assiduously abided by the ethics strictures since joining EPA, which this draft reflects. (b) (5)

(b) (6)
(b) (6) but you can change that if
you want.

After you sign and date it, please ask someone to pdf the final to me for distribution.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room
4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use
20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: here's what you should review this weekend
Date: Friday, January 25, 2019 5:53:00 PM
Attachments: [278e for preclearance.pdf](#)
[EA for preclearance Wright for 2019.docx](#)

Hi there,

Please review this message from the Office of Government Ethics over the weekend. Then, on Monday when you send me the signed ethics agreement, you can attest to all of their questions below. Then they will begin those preclearance steps I detailed in my last email:

Justina:

(b) (5), (b) (6)



So happy this got done so quickly, and it's really all because of how carefully you filled out the form and how swiftly you answered the pesky questions!

Thanks!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: last thing (or two)
Date: Friday, January 25, 2019 3:45:00 PM
Attachments: [EA for preclearance Wright for 2019.docx](#)

Hi there,

Thanks for all of the information and for getting in touch with (b) (6). OGE and I have now made the corrections to your report, (b) (6), (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Sorry to be tardy in responding, but the news of the shutdown ended made me refocus some of my attention today.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Friday, January 25, 2019 1:30 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Checking In

Justina

You are correct. (b) (6)

Thank you.

Peter

From: Fugh, Justina
Sent: Friday, January 25, 2019 1:23 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: RE: Checking In

Hi there,

Just want to be sure I understood your response. Didn't you mean to say ... (b) (6)

[REDACTED]

[REDACTED]

Your ever cautious friend,

Justina

From: Wright, Peter
Sent: Friday, January 25, 2019 12:30 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Checking In

Justina

(b) (6)

Peter

From: Fugh, Justina
Sent: Friday, January 25, 2019 11:22 AM
To: Wright, Peter <wright.peter@epa.gov>
Subject: RE: Checking In

Thanks! I've made the few changes to your financial disclosure report for you (b) (6). Sent your other answers to OGE to see if we need to make any changes to the ethics agreement or to the form. Until I hear from you otherwise, we've left (b) (6).

Will keep you posted on what I hear from OGE!

Justina

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North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Friday, January 25, 2019 10:44 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Checking In

Justina

I was able to (b) (6)

I will provide you with further

information once I receive it.

Peter

From: Fugh, Justina
Sent: Thursday, January 24, 2019 10:29 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: RE: Checking In

Hi there,

We got very quick attention to your report (hooray!), and OGE has already sent us their comments. I've made some changes already, but here are the questions for you:

[illegible]

Justina

From: Wright, Peter
Sent: Thursday, January 24, 2019 5:39 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Checking In

I thought I would check in. I ran into Troy this morning and he said you were working with OGE. Let me know if there is any information you or OGE need. Thank you for all of your help.

Peter C Wright
Special Counsel, Office of the Administrator
United States Environmental Protection Agency

1301 Constitutional Ave NW
Washington, DC
202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: one small change to your ethics agreement
Date: Monday, January 28, 2019 6:06:00 PM
Attachments: [EA for preclearance Wright for 2019.docx](#)

Hi Peter,

OGE has asked to (b) (5), (b) (6)

[REDACTED]

If you are okay with the revision, then just let me know. You will not have to re-sign the agreement because the change is on page 1 only. Once we hear back from you, we can move ahead with your preclearance tomorrow.

Thanks,

Justina

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From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Another Questions
Date: Sunday, August 26, 2018 1:06:00 PM

Hi Peter,

Since the position of class agent is not elected, I'm going to say that you can continue to do it.

(b) (5)

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Saturday, August 25, 2018 1:49 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Another Questions

Justina

About 12 years ago I was appointed to be a class agent following work that I did helping to organize our 25th reunion. The other class agent for my has been the class agent for our class since we graduated 37 years ago. I do think the position is the same as what other colleges call class correspondents. We write periodic newsletters (or more recently communicate more through social media) to share information about classmates and the college. The college alumni office makes the selection.

I had been the co-chair of the Executive Committee of the Society of Class Agents, which meant that I also served on the College's National Association of Wabash Men. I resigned both of those positions. The co-chair was an elected position.

I would think (b) (5) as a class agent is simply involved in communication and has authority and limited supervision. The class agents provide the contents of class agent letters to the college alumni office and the letter is formatted and distributed by the college. Most but not every year the class agent are invited to a meeting on campus (recently with other volunteer groups) to hear from the college president and others and to share best practices communicating with classmates, planning reunions, etc.

(b) (5)

(b) (5) I can continue to be supportive as a volunteer alumnus without having a formal role or title.

Thank you for your response and guidance. It is most appreciated.

Peter

Sent from my iPad

On Aug 24, 2018, at 10:39 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hmm. Remember, (b) (5)

(b) (5)

Well, the Office of Government Ethics says that you are supposed to report "positions includ[ing] those of an officer, director, general partner, limited partner with an active role, proprietor, representative, executor, trustee, employee, or consultant of any for-profit or non-profit organization." You don't have to report:

- Positions held in a religious, social, fraternal, or political organization
- Positions solely of an honorary nature
- Mere membership in an organization
- Service as a member of an advisory board or committee if the following criteria are met: (1) your service is unpaid; (2) the board or committee is that of a non-profit or governmental organization; (3) you have no fiduciary duties of the sort exercised by officers, directors, or trustees; and (4) your role does not involve sufficient supervision by the organization to create a common law employee-employer relationship.

So where does "class agent" fall? At my college, the position of "class correspondent" (which sounds like what the "class agent" does) is in fact included in the list of class officers, and we vote for them as part of the slate of officers. Is your position voted on too?

Justina

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From: Wright, Peter

Sent: Friday, August 24, 2018 2:58 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Another Questions

Justina

When I was in your office I meant to ask you whether I need to give up being a "class agent" for my college graduation class. I have not done anything related to being a class agent since joining the agency. As a class agent, myself and another classmate, periodically correspond with classmates sharing news about other classmates, the college and reminding them about dates, reunions and annual giving. For example, it would be typical to report that I have moved to Washington, D.C. and begun to work for the EPA.

I just got a notice about a class agents meeting at the college. If I need to resign, I will let them know. If you need more information, please let me know.

There is no urgency as the meeting is not until 9/8 and can even then let them know.

I hope you have the opportunity to enjoy this beautiful weather. Have a good weekend.

Peter

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Checking In
Date: Thursday, January 24, 2019 10:29:00 PM
Attachments: [EA for preclearance Wright for 2019.docx](#)

Hi there,

We got very quick attention to your report (hooray!), and OGE has already sent us their comments. I've made some changes already, but here are the questions for you:

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6
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[REDACTED]

Also, we will you to sign a new ethics agreement. Here's the current draft, but don't sign it yet. I want to be sure that OGE is okay with this latest version first.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter

Sent: Thursday, January 24, 2019 5:39 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Checking In

Justina

I thought I would check in. I ran into Troy this morning and he said you were working with OGE. Let me know if there is any information you or OGE need. Thank you for all of your help.

Peter

Peter C Wright

Special Counsel, Office of the Administrator

United States Environmental Protection Agency

1301 Constitutional Ave NW

Washington, DC

202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: Re: Cupcake Question
Date: Thursday, July 19, 2018 7:24:10 PM

Hi Peter,
Your cupcake question is now my favorite question ever! Yes, you may use personal funds to pay for and have delivered those cupcakes. No ethics issues for you for the purchase or for the employees to accept. Enjoy!
Justina

Sent from my iPhone

On Jul 19, 2018, at 6:15 PM, Wright, Peter <wright.peter@epa.gov> wrote:

Justina

I was planning on purchasing with my own funds and having delivered cupcakes to Potomac Yards and Federal Triangle cupcakes for the OLEM staff next Wednesday to celebrate and recognize the one year anniversary of the Superfund Task Force and to thank everyone for their welcome of me.

I recall that you said it was okay to share food. I wanted to double check with you logistically this is a bit more than a box of donuts. Can I do this? I would send a note that made very clear that all funds for purchase and delivery were my own personal funds. I would of course also include some nice comments about those who worked on the Task Force and who will be supporting it and the other very important work of OLEM moving forward.

Your counsel is much appreciated.

Peter

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: (b) (6)
Date: Monday, August 06, 2018 12:07:00 PM

Hi Peter,

I'm out of the office today, so let me get back to you tomorrow. (b) (6), (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[Justina](#)

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Monday, August 06, 2018 10:39 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: (b) (6)

Justina

(b) (6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please let me know if you need additional information. I am interested in moving this along now that

(b) (6)

Thank you as always for your help and guidance.

Have a great week.

Peter

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Financial Form
Date: Wednesday, January 23, 2019 9:25:00 AM

Hi there,

The reporting period for Part 2 is “preceding calendar year to filing date” (see chart below), so that’s just CY 2018 + CY 2019. (b) (5)

The Reporting Periods for the OGE Form 278e vary depending on the type of report being filed.

Part	
	Nominee, New Entrant, and Candidate
1. Filer’s Positions	Preceding Two Calendar Years to Filing Date
2. Filer’s Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date ¹
3. Filer’s Employment Agreements and Arrangements	As of Filing Date
4. Filer’s Sources of Compensation Exceeding \$5,000 in a Year	Preceding Two Calendar Years to Filing Date (n/a for Candidates)
5. Spouse’s Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date ¹
6. Other Assets and Income	Preceding Calendar Year to Filing Date ¹
7. Transactions	N/A – Leave this Part blank
8. Liabilities	Preceding Calendar Year to Filing Date ¹
9. Gifts and Travel Reimbursements	N/A – Leave this Part blank

1. For example, if today is March 3, 2016, the reporting period would run from January 1, 2015 to March 3, 2016. The filer may end the reporting period for assets and liabilities on any day within 31 days of the filing date.

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From: Wright, Peter
Sent: Wednesday, January 23, 2019 8:59 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Financial Form

Justina

I made changes and updates and submitted the form. In a bit, I will address your other email with

the questions that OGE will ask. For now, I will respond to your responses below to my questions.
Peter

Sent from my iPad

On Jan 22, 2019, at 6:40 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi Peter,

I can't see your report yet, so let's see if I can answer your questions anyway
(fingers crossed):

(b) (6), (b) (5)
[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

(b) (6), (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

JUSTINA: Terrific!

I will separately respond to your list of topics/questions.

JUSTINA: Thanks.

I am optimistic with just a bit of tweaking this should be done. I know that there is some urgency with this as the EPW Committee wants to mark me up on Feb. 5

JUSTINA: And I'm poised and ready to do my part to move your paperwork along, as is the Office of Government Ethics.

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-----Original Message-----

From: Wright, Peter

Sent: Monday, January 21, 2019 3:54 PM

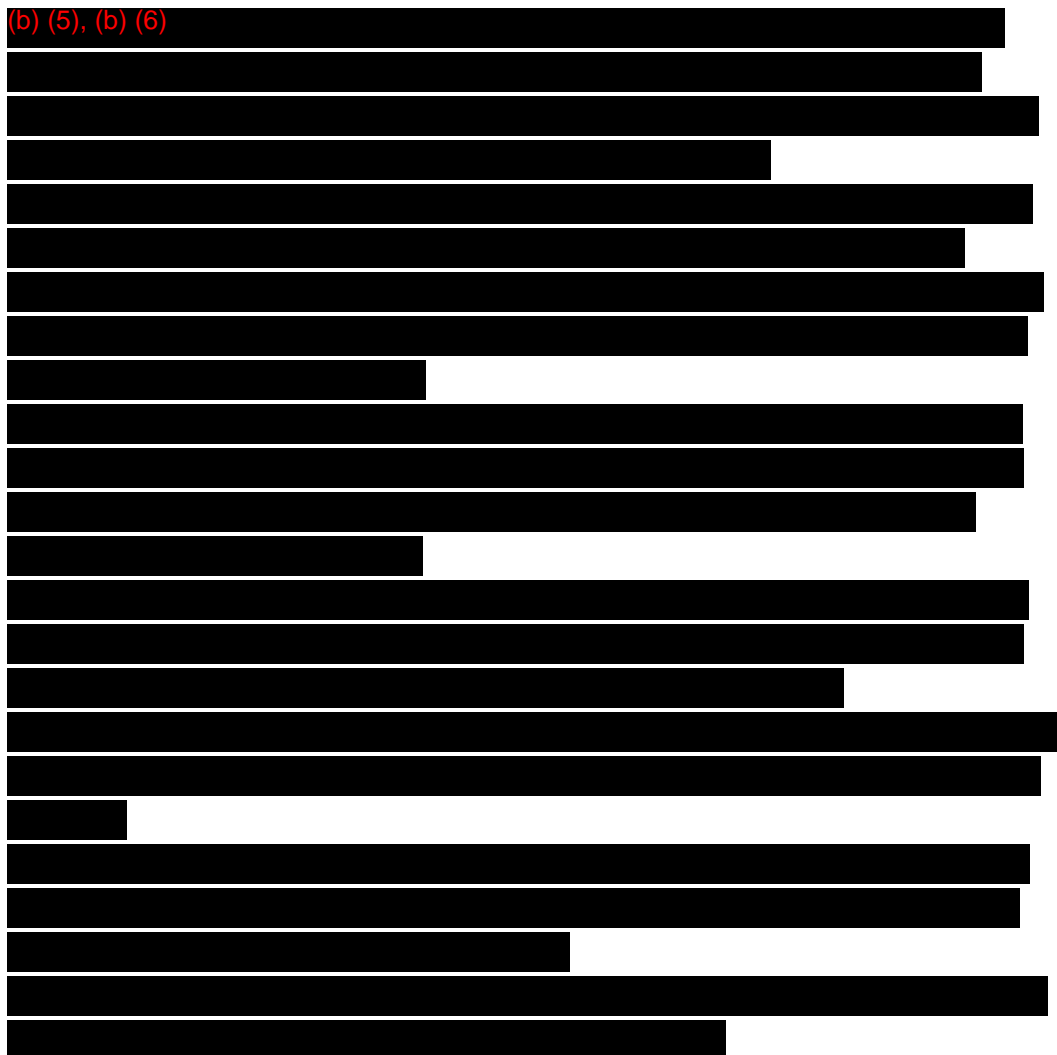
To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Financial Form

Justina

I have been working on the updates to my financial form and am just about complete with everything I understand how to work on. The following is a list of questions and a few things that I think I can correct.

(b) (5), (b) (6)



I am optimistic with just a bit of tweaking this should be done. I know that there is some urgency with this as the EPW Committee wants to mark me up on Feb. 5
Thank you for all of your assistance. I hope you have a good visit to your alma mater.

Peter

Sent from my iPad

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Cc: [Shimmin, Kaitlyn](#)
Subject: Re: Financial Form
Date: Friday, January 18, 2019 1:12:11 PM

Hi Peter,

Yes, please update your prior nominee reporter, but use the reporting periodic I sent you yesterday. I expect there will be changes from your previous submission. Let me know if I can provide any assistance.

While I am thinking about it, I will need to write another ethics agreement for you to sign as part of the preclearance process. But you should concentrate on getting your report done first.

Over the weekend, I'll send you the language to insert in your senate questionnaire about ethics. I am on the road to my alma mater today (but my husband is driving) so can't do that right now.

Justina

Sent from my iPhone

On Jan 18, 2019, at 12:21 PM, Wright, Peter <wright.peter@epa.gov> wrote:

Justina and Kaitlyn

The PPO office just sent me a note asking me to update my financial disclosure form. I also got an automated email saying a blank form was set up for me. I assume that I need to update the existing form and plan to do so over the weekend with the goal of finishing on Monday. If it is not correct to update the existing form, please let me know. Thank you for all of your assistance.

Peter

Peter C Wright
Special Counsel, Office of the Administrator
United States Environmental Protection Agency
1301 Constitutional Ave NW
Washington, DC
202-566-9988

- (b) (6), (b) (5)

-

Peter

Peter C Wright

Special Counsel, Office of the Administrator

United States Environmental Protection Agency

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202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Follow Up
Date: Monday, March 11, 2019 6:14:00 PM

Hi,

(b) (6). You must be relieved to have this done!

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Monday, March 11, 2019 1:09 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Follow Up

Justina

(b) (6)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted] I will complete the form, sign it and send to you.

Thank you.

Peter

Peter C Wright

Special Counsel, Office of the Administrator

United States Environmental Protection Agency

1301 Constitutional Ave NW

Washington, DC

202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Gift from ITEP
Date: Monday, August 20, 2018 2:44:00 PM

Sure! I'm here all day today until about 5:45 and tomorrow until about 3:30 (leaving to catch a flight to Region 6).

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Monday, August 20, 2018 2:09 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Gift from ITEP

Justina

Can I drop the gift from the ITEP by that I receive at the TLEF to your office later this afternoon or sometime tomorrow?

Peter

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Here's the draft
Date: Tuesday, July 24, 2018 2:39:00 PM

I just talked to James and he knows it's coming and why it's being signed today (because I was tardy in getting it to you). So I can send it to him or you can. Either way is fine as he already got a note from me explaining that any delay is my fault and that you've been assiduously abiding by the terms anyway.

From: Wright, Peter
Sent: Tuesday, July 24, 2018 2:35 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Here's the draft

Justina

I have signed it and it is being scanned and will be sent to you for distribution. Can I assume it is okay to provide a scanned copy to James Hewitt so that he might provide it to a reporter.

Peter

From: Fugh, Justina
Sent: Tuesday, July 24, 2018 2:24 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: Here's the draft

Hi Peter,

I apologize for my delay in getting this to you, but as I indicated, (b) (6)

I've been out of the office a few days and have not been able to review this draft to get it to you. That said, I know that you have assiduously abided by the ethics strictures since joining EPA, which this draft reflects. (b) (5)

but you can change that if you want.

After you sign and date it, please ask someone to pdf the final to me for distribution.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Keith, Jennie](#)
To: [Fugh, Justina](#)
Subject: RE: Karl Bourdeau Retirement Celebration - March 18, Washington, DC
Date: Tuesday, March 12, 2019 9:44:00 AM

Justina (b) (5)

(b) (5)

(b) (5)

Jennie

From: Fugh, Justina
Sent: Friday, March 08, 2019 9:13 AM
To: Keith, Jennie <Keith.Jennie@epa.gov>
Subject: FW: Karl Bourdeau Retirement Celebration - March 18, Washington, DC

(b) (5)

(b) (5) Your thoughts?

From: Wright, Peter
Sent: Thursday, March 07, 2019 5:17 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: FW: Karl Bourdeau Retirement Celebration - March 18, Washington, DC
Justina

Is there any issue with attending this event? I have known Karl for many years. I am not aware that any of the Beveridge lawyers are lobbyists but known of the lawyers that I know at the firm are to my knowledge lobbyists. I expect any number of other EPA and other agency lawyers will be attending.

Thank you.

Peter

From: Beveridge & Diamond PC <bdlaw@bdlaw.com>
Sent: Monday, February 25, 2019 4:16 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: Karl Bourdeau Retirement Celebration - March 18, Washington, DC

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You're Invited...





Join Us to Celebrate the Remarkable Career of Karl Bourdeau

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Karl's passion for, and dedication to, environmental law is evident to those with whom he has worked. With a wide-ranging litigation, regulatory, transactional and legislative practice, his work on CERCLA and RCRA issues throughout his career has been exemplary and is widely recognized.

Please join us at a reception in celebration of Karl's long and distinguished career with the firm.

Reception Details



Date

Monday, March 18, 2019

**Time**

6:00 – 8:30 p.m.

**Location**[Joe's Seafood, Prime Steak, & Stone Crab](#)

Gigi Room

750 15th Street NW

Washington, DC 20005

[View map](#)*Valet Parking Available***Questions**Contact [Lindy Resh](#), (b) (6)**RSVP**

"One of my favorite stories of Karl dates back to the 80's. After a court hearing in Connecticut, Karl addressed a group of reporters he assumed were there to hear about the case our team was working on. With confidence, he approached them and stated,

"Hello, my name is Karl Bourdeau. Perhaps you've heard of me."

They hadn't heard of him, but I am certain they remember him to this day."

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- willingness to share ideas, big and small – with details,
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- Kathy Szmuszkovicz, B&D Principal

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From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Cc: [Keith, Jennie](#)
Subject: RE: Karl Bourdeau Retirement Celebration - March 18, Washington, DC
Date: Monday, March 11, 2019 2:17:00 PM

Hi there,

The cost per person for you to attend this event will be \$75 to cover the food and non-alcoholic beverages. If you choose to drink, then you will need to be clear that you want them to open a tab for you that you will have to pay yourself (they will give you a receipt). I advise you to write a personal check made out to Beveridge and Diamond so that you have a record that you paid for yourself, thus not violating the Trump Ethics Pledge.

Thus far, you are the only political appointee who has asked me about attendance, but this is the advice I will be giving to all political employees. If you happen to hear of anyone else who is attending, then please ask them to contact me, too!

Best regards,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Thursday, March 07, 2019 5:17 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: FW: Karl Bourdeau Retirement Celebration - March 18, Washington, DC
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Thank you.

Peter

From: Beveridge & Diamond PC <bdlaw@bdlaw.com>
Sent: Monday, February 25, 2019 4:16 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: Karl Bourdeau Retirement Celebration - March 18, Washington, DC

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**Location**[Joe's Seafood, Prime Steak, & Stone Crab](#)

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Washington, DC 20005

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- Kathy Szmuszkovicz, B&D Principal

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From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Karl Bourdeau Retirement Celebration - March 18, Washington, DC
Date: Friday, March 08, 2019 9:40:00 AM

Yep. I'm on it!

From: Wright, Peter
Sent: Friday, March 08, 2019 9:36 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Karl Bourdeau Retirement Celebration - March 18, Washington, DC

Justina

Thank you for getting back to me so quickly. The attendance cost might be handy for others as well.

Peter

From: Fugh, Justina
Sent: Friday, March 8, 2019 9:20 AM
To: Wright, Peter <wright.peter@epa.gov>
Subject: RE: Karl Bourdeau Retirement Celebration - March 18, Washington, DC

Hi Peter,

Under the Trump ethics pledge, political appointees cannot accept any gift that is offered by a federally registered lobbyist, which Beveridge and Diamond is. Admittedly, there is an exception for gifts from a personal friend (who may even be a lobbyist), but I'm not inclined to say that this situation fits into that category. This event celebrates your friend, sure, but it's sponsored and paid for by his firm, so the gift is really from the firm itself.

I've got a call into the firm to ascertain the cost per person. So long as you pay for your attendance, it's not a gift that triggers the ban. The contact person doesn't work on Fridays, so I'll get back to you early next week.

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Thursday, March 07, 2019 5:17 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: FW: Karl Bourdeau Retirement Celebration - March 18, Washington, DC

Justina

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Thank you.

Peter

From: Beveridge & Diamond PC <bdlaw@bdlaw.com>
Sent: Monday, February 25, 2019 4:16 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: Karl Bourdeau Retirement Celebration - March 18, Washington, DC

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**Questions**

Contact [Lindy Resh](#), (b) (6)

RSVP

"One of my favorite stories of Karl dates back to the 80's. After a court hearing in Connecticut, Karl addressed a group of reporters he assumed were there to hear about the case our team was working on. With confidence, he approached them and stated,

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From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: last thing (or two)
Date: Friday, January 25, 2019 3:45:00 PM
Attachments: [EA for preclearance Wright for 2019.docx](#)

Drat, forgot to remind you to look at the attached ethics agreement to see if it's okay with you.

From: Fugh, Justina
Sent: Friday, January 25, 2019 3:45 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: last thing (or two)

Hi there,

Thanks for all of the information and for getting in touch with (b) (6). OGE and I have now made the corrections to your report, with one exception: (b) (5), (b) (6)

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Sorry to be tardy in responding, but the news of the shutdown ended made me refocus some of my attention today.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Friday, January 25, 2019 1:30 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Checking In

Justina

You are correct. (b) (6)

Thank you.

Peter

From: Fugh, Justina
Sent: Friday, January 25, 2019 1:23 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: RE: Checking In

Hi there,

Just want to be sure I understood your response. Didn't you mean to say ... (b) (6)

Your ever cautious friend,
Justina

From: Wright, Peter

Sent: Friday, January 25, 2019 12:30 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: Checking In

Justina

(b) (6)

Peter

From: Fugh, Justina

Sent: Friday, January 25, 2019 11:22 AM

To: Wright, Peter <wright.peter@epa.gov>

Subject: RE: Checking In

Thanks! I've made the few changes to your financial disclosure report for you (b) (6)

(b) (6) Sent your other answers to OGE to see if we need to make any changes to the ethics agreement or to the form. Until I hear from you otherwise, we've left (b) (6)

(b) (6) Will keep you posted on what I hear from OGE!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter

Sent: Friday, January 25, 2019 10:44 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: Checking In

Justina

I was able to look up (b) (6)

(b) (6) I will provide you with further information once I receive it.

Peter

From: Fugh, Justina

Sent: Thursday, January 24, 2019 10:29 PM

To: Wright, Peter <wright.peter@epa.gov>

Subject: RE: Checking In

Hi there,

We got very quick attention to your report (hooray!), and OGE has already sent us their comments. I've made some changes already, but here are the questions for you:

(b) (5), (b) (6)



- 
- 
- 
- 



Also, we will you to sign a new ethics agreement. Here's the current draft, but don't sign it yet. I want to be sure that OGE is okay with this latest version first.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the
zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter

Sent: Thursday, January 24, 2019 5:39 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Checking In

Justina

I thought I would check in. I ran into Troy the is morning and he said you were working with OGE. Let me

know if there is any information you or OGE need. Thank you for all of your help.

Peter

Peter C Wright

Special Counsel, Office of the Administrator

United States Environmental Protection Agency

1301 Constitutional Ave NW

Washington, DC

202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: last thing (or two)
Date: Friday, January 25, 2019 4:10:00 PM
Attachments: [EA for preclearance Wright for 2019.docx](#)

Hi,

Thanks for the speedy replies! (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the
zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Friday, January 25, 2019 3:53 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: last thing (or two)

Justina

I think that (b) (6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The ethics agreement is fine with me.

I hope this does it.

Thank you.

Peter

From: Fugh, Justina
Sent: Friday, January 25, 2019 3:45 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: last thing (or two)

Hi there,

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

(b) (5), (b) (6)



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From: Wright, Peter

Sent: Friday, January 25, 2019 1:30 PM

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Subject: RE: Checking In

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Subject: RE: Checking In

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Justina

From: Wright, Peter

Sent: Friday, January 25, 2019 12:30 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: Checking In

Justina

(b) (6)



Peter

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(b) (5), (b) (6)

Special Counsel, Office of the Administrator
United States Environmental Protection Agency
1301 Constitutional Ave NW
Washington, DC
202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Meeting
Date: Friday, March 01, 2019 10:07:00 AM

Okay! I'm in room 4308 North.

From: Wright, Peter
Sent: Friday, March 01, 2019 10:07 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Meeting

Justina

I now have a short meeting at 10:30. I will head your way right after that.

Thank you.

Peter

From: Fugh, Justina
Sent: Friday, March 1, 2019 10:04 AM
To: Wright, Peter <wright.peter@epa.gov>
Subject: RE: Meeting

Howdy!

I am in the office all morning with nary a meeting on my calendar. I am leaving at 1:45 today, though, to (b) (6). I can come over to you (if you remind me your room number) any time you like.

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Friday, March 01, 2019 9:46 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Meeting

Justina

I need to come speak with you about a matter at your earliest convenience. I am open this morning and have some times this afternoon.

Let me know when would work best for you.

Thank you,

Peter

Peter C Wright

Special Counsel, Office of the Administrator
United States Environmental Protection Agency
1301 Constitutional Ave NW
Washington, DC
202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Cc: [Griffo, Shannon](#); [Darwin, Veronica](#)
Subject: RE: Potential Meeting with Lobbying Group
Date: Wednesday, September 26, 2018 7:34:00 PM

Hi there,

Now that EPA has confirmed that a representative of DowDuPont will be present, we cannot allow you to attend the meeting. The reason is unrelated to the ethics pledge but rather solely related to the fact that you have a financial conflict of interest with that company and cannot participate in or attend a meeting at which their representatives are present.

(b) (5), (b) (6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] So we can't allow you to participate in

the meeting because of the presence of the Dow representatives.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Wednesday, September 26, 2018 3:45 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Potential Meeting with Lobbying Group

Justina

Here is the attendance list for the AROW meeting that shows representatives from 5 companies plus Dow as attending together with attorney's and lobbyists.

Steve Shestag, Boeing, Director of Environment

Peter Pagano, Boeing, Director of Government Operations

Doug Reid-Green, BASF, Remediation Expert

Mark Washko, BASF, Head of Federal Government Affairs

Robert Nolan, ExxonMobil, Senior Government Relations Advisor

Mary Draves, Dow, Global Director of Environmental Remediation and Restoration

Dennis Deziel, Dow, Director of Government Affairs

Peter Saba, Schnitzer Steel, Senior Vice President and General Counsel

Jeremy Karpatkin, Arnold & Porter, Associate

Bill Hague, Honeywell, Director of Remediation Design & Construction

Rich Gold, Alliance to Restore Our Waterways, Executive Director

Marissa Serafino, Alliance to Restore Our Waterways

Dimitri Karakitsos, Alliance to Restore Our Waterways

The meeting with the Administrator is tomorrow afternoon. Steven Cook is traveling and so is unable to attend.

Peter

From: Wright, Peter

Sent: Tuesday, September 25, 2018 1:30 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Cc: Griffio, Shannon <Griffio.Shannon@epa.gov>

Subject: RE: Potential Meeting with Lobbying Group

Justina

I have asked Veronica Darwin, who is attending the meeting, to inquire about the attendees and I will let you know. I did not know that Rich worked at EPA, but in retrospect, I am not surprised.

Peter

From: Fugh, Justina

Sent: Tuesday, September 25, 2018 1:28 PM

To: Wright, Peter <wright.peter@epa.gov>

Cc: Griffio, Shannon <Griffio.Shannon@epa.gov>

Subject: RE: Potential Meeting with Lobbying Group

Hi Peter,

I remember Rich Gold from when he was an EPA attorney! We know that Rich is a partner at Holland & Knight, and he lobbies on their behalf for the Alliance to Restore Our Waterways (AROW) and serves as their Executive Director. When former Administrator Scott Pruitt met with AROW previously to talk about "ways to improve implementation of the Superfund program," the attendees included Rich, plus two others from AROW, as well as two representatives from Dow. We will want to know for certain that none of the attendees is an employee of Dow. Do you want to reach out to Rich (or ask someone in OLEM), or would you prefer that OGC/Ethics did so?

Justina

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From: Wright, Peter

Sent: Tuesday, September 25, 2018 8:34 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Potential Meeting with Lobbying Group

Justina

Rich Gold a lobbyist with Holland & Knight, representing Alliance to Restore our Waterways (AROW), is scheduling a meeting to discuss Superfund and sediment matters. I think that Dow was a member of this group as were other companies that were members of the Sediment Management Work Group (SMWG). The SMWG as it was organized could not lobby and some portion of the members created this separate entity. I am wondering what information do I need to know and share with you to determine whether I can participate in this meeting. I understand that I cannot discuss any of the sites from which I am recused which of course includes two of the largest sediment sites.

Thank you for your help.

Peter

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Renomination - Updating the Paperwork
Date: Thursday, January 17, 2019 2:33:00 PM

Hi there,

Well, (b) (5)

The Reporting Periods for the OGE Form 278e vary depending on the type of report being filed.

Part	Nominee, New Entrant, and Candidate
1. Filer's Positions	Preceding Two Calendar Years to Filing Date
2. Filer's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date ¹
3. Filer's Employment Agreements and Arrangements	As of Filing Date
4. Filer's Sources of Compensation Exceeding \$5,000 in a Year	Preceding Two Calendar Years to Filing Date (n/a for Candidates)
5. Spouse's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date ¹
6. Other Assets and Income	Preceding Calendar Year to Filing Date ¹
7. Transactions	N/A – Leave this Part blank
8. Liabilities	Preceding Calendar Year to Filing Date ¹
9. Gifts and Travel Reimbursements	N/A – Leave this Part blank

1. For example, if today is March 3, 2016, the reporting period would run from January 1, 2015 to March 3, 2016. The filer may end the reporting period for assets and liabilities on any day within 31 days of the filing date.

2. Filers do not need to include any period when they were not an officer or employee of the United States Government.

Just so you know, I am excepted for this sort of activity, so let me know if you need any help.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter

Sent: Thursday, January 17, 2019 1:24 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Renomination - Updating the Paperwork

Justina

Happy New Year to you!

I was just renominated and so I need to update my EPW Committee questionnaire, which should not be difficult, and update my financial disclosure. Of course, the financial disclosure will be a more time consuming endeavor because (b) (6)

[REDACTED]

Assuming that I can gather all of the information and update the form this weekend, would be appropriate to show the values as of December 31 or does it need to be as of the day I file the report.

Thank you in advance for your assistance.

Peter

Peter C Wright

Special Counsel, Office of the Administrator

United States Environmental Protection Agency

1301 Constitutional Ave NW

Washington, DC

202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Request for meeting with ACC on Plastic Recovery
Date: Sunday, August 26, 2018 1:13:00 PM

Correct. Let's have you decline (b) (6) Hope your travels to Vermont go well. Enjoy ECOS!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Sunday, August 26, 2018 12:55 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Fwd: Request for meeting with ACC on Plastic Recovery

Justina

I expect that I need to not accept this meeting (b) (6). I am seeking your confirmation. I do not expect there is anything time critical about this meeting and if so Steven Cook and Barry can attend.

Thank you.

Peter

Sent from my iPad

Begin forwarded message:

From: "Russell, Steven K." <Steven_Russell@americanchemistry.com>
Date: August 25, 2018 at 5:17:21 PM EDT
To: "wright.peter@epa.gov" <wright.peter@epa.gov>
Cc: "johnson.barnes@epa.gov" <johnson.barnes@epa.gov>, "Cookson, Craig" <Craig_Cookson@americanchemistry.com>, "Joseph, Aiysha D." <Aiysha_Joseph@americanchemistry.com>
Subject: Request for meeting with ACC on Plastic Recovery

Special Counsel Wright,

Attached is a meeting request from the American Chemistry Council to discuss pathways to achieving our goal for 100% reuse, recycling or recovery of plastic packaging by 2040.

Regards,

Steve Russell

Steve Russell | American Chemistry Council
Vice President, Plastics Division
steven_russell@americanchemistry.com
700 2nd Street, NE | Washington, DC | 20002
O: 202.249.6600 C: (b) (6)

www.americanchemistry.com/plastics

www.plasticsmakeitpossible.com

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American Chemistry Council, 700 – 2nd Street NE, Washington, DC 20002,

www.americanchemistry.com

From: [Keith, Jennie](#)
To: [Thornton, Kecia](#); [Fugh, Justina](#)
Subject: RE: Seeking Approval to attend - 2019 Leaders In Technology Dinner
Date: Thursday, December 20, 2018 12:06:00 PM

Hey Justina (on lunch break from the training), I'll take care of this working with Kecia, and we'll cycle back to Peter.

Kecia, I believe there are four employees traveling from OP. Just so you know, the CES offered to pay travel expenses for them all, and to participate in the leadership program they have. So, approval of the ethics travel form allows them to participate in all of the leadership program events (including this dinner). I have approved them all (but that reminds me, I think I need to process the ethics travel forms through Lotus Notes still – note to self).

We may also use the ethics travel form to cover the dinner provided to OLEM employees . . . but let me read through your other email you sent the other day which has more details on it.

Thanks!

Jennie for OGC/Ethics

From: Thornton, Kecia
Sent: Thursday, December 20, 2018 12:01 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Keith, Jennie <Keith.Jennie@epa.gov>
Subject: RE: Seeking Approval to attend - 2019 Leaders In Technology Dinner
The following OLEM employees plan to attend the Consumer Electronics Show
Attendees from ORCR:

Barnes Johnson (SES)
Cheryl Coleman (SES)
Kimberly Cochran
Karen Pollard
Janice Johnson (Tentative)
Brandon Bray

According to ORCR, everyone was invited to the dinner and, I believe, plan to attend that as well. Also, I understand OP was invited as well.

From: Fugh, Justina
Sent: Wednesday, December 19, 2018 8:23 PM
To: Thornton, Kecia <Thornton.Kecia@epa.gov>
Cc: Keith, Jennie <Keith.Jennie@epa.gov>
Subject: FW: Seeking Approval to attend - 2019 Leaders In Technology Dinner
[Hey, did you already vet this invitation for others in OLEM? Who else is going?](#)
Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Wednesday, December 19, 2018 4:05 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Seeking Approval to attend - 2019 Leaders In Technology Dinner
Justina

I am seeking approval to be able to attend two receptions at the Consumer Electronics show during the second week of January. I do not need an answer this calendar year.

I am presenting awards on behalf of EPA at the upcoming Consumer Electronics show in Las Vegas. EPA attendees are provided with complimentary registration that apparently includes the reception and dinner

below (and possibly one the following night) that will be attended by many people. I understand from the RCRA program that they have received their ethics clearance to attend these included receptions. Please let me know if you need more information.
If we do not touch base yet this year, please accept my best wishes for a Happy Holiday season.
Peter

From: Gary Shapiro <LITdinner@CTA.tech>

Sent: Wednesday, December 19, 2018 1:34 PM

To: Wright, Peter <wright.peter@epa.gov>

Subject: Registration Confirmed - 2019 Leaders In Technology Dinner

Leaders in Technology Dinner Wednesday, January 9



Dear Peter,

Your registration has been confirmed. Please save this email for future reference.

Event: 2019 Leaders In Technology Dinner

Attending: Peter Wright

Total Registrants: 1

Start Time: 6:30 PM

Start Date: Wednesday, January 9, 2019

Location: Wynn Las Vegas, Lafite Ballroom

Address: 3131 Las Vegas Blvd.South, Las Vegas, Nevada 89109, USA

Confirmation Number: FRNSBQ8VBH3 (needed to view/modify your online registration)

Registration Information:

Registration Items

Peter Wright

VIP Entry

[Click here](#) to view your online registration confirmation.

[Click here](#) to modify your registration.

We look forward to seeing you in Las Vegas!



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http://www.cvent.com/d/9_PZT5E0Lk-VufEJGzTGBg/blc9/P1/0R?

If you no longer want to receive emails from Laura Hudson please click the link below.

[Opt-Out](#)



From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Cc: [Keith, Jennie](#)
Subject: RE: Seeking Approval to attend - 2019 Leaders In Technology Dinner
Date: Friday, December 21, 2018 3:15:00 PM

Hi Peter,

Jennie Keith of OGC/Ethics is coordinating with Kecia Thornton to be sure that we provide advice to all of the EPA employees who may be attending this event (there are four in OP, for example). You should hear back from either Jennie or Kecia soon, notwithstanding the possible shutdown.

Cheers,

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Wednesday, December 19, 2018 4:05 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Seeking Approval to attend - 2019 Leaders In Technology Dinner

Justina

I am seeking approval to be able to attend two receptions at the Consumer Electronics show during the second week of January. I do not need an answer this calendar year.

I am presenting awards on behalf of EPA at the upcoming Consumer Electronics show in Las Vegas. EPA attendees are provided with complimentary registration that apparently includes the reception and dinner below (and possibly one the following night) that will be attended by many people. I understand from the RCRA program that they have received their ethics clearance to attend these included receptions.

Please let me know if you need more information.

If we do not touch base yet this year, please accept my best wishes for a Happy Holiday season.

Peter

From: Gary Shapiro <LITdinner@CTA.tech>
Sent: Wednesday, December 19, 2018 1:34 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: Registration Confirmed - 2019 Leaders In Technology Dinner

Leaders in Technology Dinner Wednesday, January 9



Dear Peter,

Your registration has been confirmed. Please save this email for future reference.

Event: 2019 Leaders In Technology Dinner
Attending: Peter Wright
Total Registrants: 1
Start Time: 6:30 PM
Start Date: Wednesday, January 9, 2019
Location: Wynn Las Vegas, Lafite Ballroom
Address: 3131 Las Vegas Blvd.South, Las Vegas, Nevada 89109, USA

Confirmation Number: FRNSBQ8VBH3 (needed to view/modify your online registration)

Registration Information:

Registration Items

Peter Wright

VIP Entry

[Click here](#) to view your online registration confirmation.

[Click here](#) to modify your registration.

We look forward to seeing you in Las Vegas!



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http://www.cvent.com/d/9_PZT5E0Lk-VufEJGzTGBg/blc9/P1/0R?

If you no longer want to receive emails from Laura Hudson please click the link below.

[Opt-Out](#)



From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Signed Ethics Agreement
Date: Monday, January 28, 2019 12:06:00 PM

Thanks! I've let OGE know that we're good to go, so hopefully they will release your 278e for you to sign soon.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Sunday, January 27, 2019 5:38 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Fwd: Signed Ethics Agreement

Justina

Here is the signed agreement.

Peter

Sent from my iPad

Begin forwarded message:

From: Peter Wright (b) (6) >
Date: January 27, 2019 at 5:27:52 PM EST
To: Peter Wright <wright.peter@epa.gov>
Subject: Signed Ethics Agreement

JAN 29 2019

Ms. Justina Fugh
Alternate Designated Agency Ethics Official
U.S. EPA (2311A)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Fugh:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Administrator for the Office of Land and Emergency Management of the United States Environmental Protection Agency.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I resigned from my position with The Dow Chemical Company, a wholly owned subsidiary of DowDuPont, Inc., in June 2018. I hold no equity interests in The Dow Chemical Company or DowDuPont, Inc. or any of its subsidiaries. I will continue to participate in The Dow Chemical Company defined benefit pension plan, but will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of The Dow Chemical Company or DowDuPont, Inc. to provide this contractual benefit, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know The Dow Chemical Company or DowDuPont, Inc. or any of its subsidiaries is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I resigned from my positions with the National Association of Wabash Men in May 2018, and the Lambda Chi Alpha Home Association of Wabash College in June 2018. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of Assistant Administrator in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that I previously signed and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Peter C. Wright', with a stylized, overlapping flourish at the end.

Peter C. Wright

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Tribal Forum Speaker Gift
Date: Friday, August 17, 2018 8:56:00 AM

Hi there,

Can you tell me who the donor was and how to reach him/her/them? I need to determine whether the donor was a federally registered lobbyist or not. If so, then you may not keep it, no matter the cost. Also, for disposition, just send it over to me. We'll evaluate the cost and, if it's something you may keep, we'll return it to you. If it must be returned, then we will mail it back to the donor.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: Wright, Peter
Sent: Friday, August 17, 2018 8:45 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Tribal Forum Speaker Gift

Justina

I spoke at the Tribal Land and Environmental Forum earlier this week. Each of the speakers on the plenary panel was given a similar cloth purse as a gift for speaking. I would guess it would have cost under \$10 although it is not something I would purchase for myself. Please advise about it appropriate disposition.

Thank you

Peter

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: RE: Update
Date: Friday, August 03, 2018 1:29:00 PM

Hi there,

Thanks for the update. And, yes, (b) (6), (b) (5)

Cheers,

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Friday, August 03, 2018 12:40 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Update

Justina

(b) (5), (b) (6)

Have a good weekend.

Peter

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Cc: [Ross, Margaret](#); [Griffo, Shannon](#)
Subject: RE: (b) (5), (b) (6) - [Message contains CUI]
Date: Wednesday, November 14, 2018 9:48:00 AM

Hi Peter,

This note confirms that you may attend both events: the ACC meeting with staffers today, and the America Recycles Day event tomorrow (even though DowDuPont will be represented). The event tomorrow is a matter of general applicability that is "open to all interested parties" for the purposes of the pledge, so does not present an issue for you.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Wednesday, November 14, 2018 9:42 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Ross, Margaret <Ross.Margaret@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: (b) (5), (b) (6) - [Message contains CUI]

Justina

I believe that the meeting today will just be ACC staffers.

Tomorrow there is the America Recycles Day event at EPA where there will be as many people as will fit in the Map Room and I know that a DowDuPont representative was among the 40 or 50 organizations invited to attend the event.


Thank you for the support.

Peter

From: Fugh, Justina
Sent: Wednesday, November 14, 2018 9:39 AM
To: Wright, Peter <wright.peter@epa.gov>
Cc: Ross, Margaret <Ross.Margaret@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: (b) (5), (b) (6) - [Message contains CUI]

Hi Peter-

(b) (5), (b) (6)



Cheers,

Justina

Sent from my iPhone

On Nov 14, 2018, at 9:09 AM, Wright, Peter <wright.peter@epa.gov> wrote:

Margaret

Thank you. This is much appreciated.

Peter

From: Ross, Margaret

Sent: Wednesday, November 14, 2018 9:08 AM

To: Wright, Peter <wright.peter@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: (b) (5), (b) (6) - [Message contains CUI]

Hi Peter,

Justina Fugh or Shannon Griffo would be the right people to answer your question. I'll give them a call to make sure someone touches base with you.

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221 | work cell 202-527-0432

From: Wright, Peter

Sent: Tuesday, November 13, 2018 12:53 PM

To: Ross, Margaret <Ross.Margaret@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: (b) (5), (b) (6) - [Message contains CUI]

Margaret

(b) (6)

(b) (6)

My short term question is whether I can attend a meeting tomorrow with the American Chemistry Council to address plastics recycling?

I appreciate that I need to (b) (5), (b) (6)

(b) (6)

Thank you.

Peter

From: Ross, Margaret

Sent: Tuesday, October 23, 2018 11:42 AM

To: Wright, Peter <wright.peter@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: (b) (5), (b) (6) - [Message contains CUI]

Hi Peter,

Thanks for getting back to me. I know how busy you are.

(b) (6), and I thank you for your commitment to meeting your ethics obligations, (b) (6), (b) (5)

(b) (6), and when everything is done, give me a call. (b) (5), (b) (6)

(b) (6)

Regards,

Margaret

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries:

20004) | phone 202-564-3221

From: Wright, Peter

Sent: Tuesday, October 23, 2018 11:19 AM

To: Ross, Margaret <Ross.Margaret@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: (b) (5), (b) (6) - [Message contains CUI]

Margaret

Sorry for the slow reply.

(b) (5), (b) (6)

[Redacted]

I would be glad to schedule some time to speak if that would be easier.

I very much appreciate your assistance.

Peter

From: Ross, Margaret

Sent: Monday, October 22, 2018 4:38 PM

To: Wright, Peter <wright.peter@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: (b) (6), (b) (5) - [Message contains CUI]

Hi Peter,

Just checking in. Were you able to take a look at (b) (6) over the weekend?

(b) (5), (b) (6)

[Redacted]

I'll look forward to hearing from you.

Best,

Margaret

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221

From: Wright, Peter

Sent: Wednesday, October 17, 2018 6:14 PM

To: Ross, Margaret <Ross.Margaret@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: (b) (5), (b) (6) - [Message contains CUI]

Margaret

Here are some quick answers to the two questions. (b) (5), (b) (6)

[REDACTED]

Thank you for your assistance.

Peter

From: Ross, Margaret

Sent: Wednesday, October 17, 2018 1:01 PM

To: Wright, Peter <wright.peter@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: (b) (5), (b) (6) - [Message contains CUI]

Hi Peter,

The Office of Government Ethics has come back to us with the following questions.

Could you please review and re-confirm?

Thanks!

Margaret

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221

From: Megan V. Granahan <mvgranah@oge.gov>

Sent: Tuesday, October 16, 2018 2:46 PM

To: Ross, Margaret <Ross.Margaret@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: (b) (5), (b) (6) - [Message contains CUI]

CONTROLLED

Hi Margaret,

(b) (5), (b) (6)

(b) (5), (b) (6)

Thank you!

m

Megan Granahan
Program Analyst (Finance)
Presidential Nominations Branch
General Counsel and Legal Policy Division

(b) (6)

Visit OGE's website: www.oge.gov <<http://www.oge.gov>>

Follow OGE on Twitter: @OfficeGovEthics

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From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: Re: you're ready to sign the nominee report in INTEGRITY, please
Date: Tuesday, January 29, 2019 4:52:54 PM

Alas. Thanks for trying and we'll wait until tonight!

Sent from my iPhone

On Jan 29, 2019, at 4:28 PM, Wright, Peter <wright.peter@epa.gov> wrote:

Justina

I was able to log in on a cell phone, but the program would not let me do any edits because it said a cell phone was too small. I will promptly sign the document when I return home.

Peter

From: Fugh, Justina
Sent: Tuesday, January 29, 2019 1:57 PM
To: Wright, Peter <wright.peter@epa.gov>
Subject: RE: you're ready to sign the nominee report in INTEGRITY, please
Okay. I'll send over to OGE what I have ready now (the signed ethics agreement and my transmittal letter) and let them know that you'll complete the INTEGRITY report later. I will bring my computer home so that I can certify the report for you tonight, so by tomorrow, everything will be with OGE.

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Tuesday, January 29, 2019 1:42 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: you're ready to sign the nominee report in INTEGRITY, please
Justina
Unless I can log in and sign on my phone it will have to wait until I get home.
Peter
Sent from my iPhone

On Jan 29, 2019, at 1:24 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi –

Please go into INTEGRITY and formally sign your nominee report.
Remember, make no additional changes, just sign the bloody thing.
As soon as you do, I can sign for the Agency.

THANKS!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US
EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal
Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip
code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: reminders about your financial disclosure report
Date: Friday, January 18, 2019 11:40:00 PM

Hi Peter,

When you finish your nominee report, I'll review it as will the Office of Government Ethics. Here are the questions that they are going to want to be sure you've addressed:

- (b) (5) [REDACTED]
 - [REDACTED]
[REDACTED]
 - [REDACTED]
[REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

So when you send the report forward, just send an email to me confirming all of these pesky items on their checklist, too, okay? (b) (5) [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Good luck with your nominee paperwork!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Wright, Peter
Sent: Friday, January 18, 2019 1:14 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Shimmin, Kaitlyn <shimmin.kaitlyn@epa.gov>
Subject: RE: Financial Form
Justina

Thank you for your guidance and assistance.
Enjoy your visit. I hope your travel is smooth and safe.
Peter

From: Fugh, Justina
Sent: Friday, January 18, 2019 1:12 PM
To: Wright, Peter <wright.peter@epa.gov>
Cc: Shimmin, Kaitlyn <shimmin.kaitlyn@epa.gov>
Subject: Re: Financial Form

Hi Peter,

Yes, please update your prior nominee reporter, but use the reporting periodic I sent you yesterday. I expect there will be changes from your previous submission. Let me know if I can provide any assistance.

While I am thinking about it, I will need to write another ethics agreement for you to sign as part of the preclearance process. But you should concentrate on getting your report done first.

Over the weekend, I'll send you the language to insert in your senate questionnaire about ethics. I am on the road to my alma mater today (but my husband is driving) so can't do that right now.

Justina

Sent from my iPhone

On Jan 18, 2019, at 12:21 PM, Wright, Peter <wright.peter@epa.gov> wrote:

Justina and Kaitlyn

The PPO office just sent me a note asking me to update my financial disclosure form. I also got an automated email saying a blank form was set up for me. I assume that I need to update the existing form and plan to do so over the weekend with the goal of finishing on Monday. If it is not correct to update the existing form, please let me know. Thank you for all of your assistance.

Peter

Peter C Wright

Special Counsel, Office of the Administrator

United States Environmental Protection Agency

1301 Constitutional Ave NW

Washington, DC

202-566-9988

From: [Fugh, Justina](#)
To: [Wright, Peter](#)
Subject: update on (b) (6)
Date: Tuesday, April 23, 2019 5:36:00 PM
Attachments: (b) (5)

Hi there,

Just a note to let you know that I've been working with the Office of Government Ethics (OGE) about (b) (5), (b) (6)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Once I hear back from them, I'll

send you the final version to sign.

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772



ETHICS PLEDGE

As a condition, and in consideration, of my employment in the United States Government in an appointee position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. I will not, within 5 years after the termination of my employment as an appointee in any executive agency in which I am appointed to serve, engage in lobbying activities with respect to that agency.
2. If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, I agree that I will abide by those restrictions.
3. In addition to abiding by the limitations of paragraphs 1 and 2, I also agree, upon leaving Government service, not to engage in lobbying activities with respect to any covered executive branch official or non-career Senior Executive Service appointee for the remainder of the Administration.
4. I will not, at any time after the termination of my employment in the United States Government, engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2017, would require me to register under the Foreign Agents Registration Act of 1938, as amended.
5. I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
6. I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
7. If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.
8. I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Appointees," issued by the President on January 28, 2017, which I have read before signing this document, defines certain terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the obligations of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Government service.

Signature

A handwritten signature in black ink, appearing to read "Peter Wright", is written over a horizontal line.

Date

July 10, 2018

Print or type your full name (last, first, middle)

Wright, Peter C




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

JUL 24 2018

MEMORANDUM

SUBJECT: Recusal Statement

FROM: Peter Wright 
Senior Advisor to the Administrator

TO: Andrew R. Wheeler
Acting Administrator

Upon consideration of my appointment, I consulted with the Office of General Counsel/Ethics (OGC/Ethics) and was advised about my ethics obligations. I have assiduously followed their advice since my appointment, and this memorandum formally notifies you of my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13770 and the Trump Ethics Pledge that I signed, as well as my own bar obligations.

FINANCIAL CONFLICTS OF INTEREST

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

As stated in my ethics agreement, I agreed to forfeit all DowDuPont, Inc. (DowDuPont) stock options that are unvested at the time of my resignation from DowDuPont and to divest of my vested stock options and stock in DowDuPont within 90 days of my federal appointment. I am currently working with OGC/Ethics to fulfill this commitment. Until I sell the stock, I

understand that I am recused from participating personally and substantially in any particular matter, including sector-specific policies and regulations, that would have a direct and predictable effect on the following:

NAME OF ENTITY	DATE WHEN RECUSAL ENDS
DowDupont, Inc.	Continues for as long as I own stock in the company. Upon divestiture, I understand that I am subject to additional restrictions pursuant to Executive Order 13770.
Chemical industry sector	Continues for as long as I own stock in this sector.

OBLIGATIONS UNDER EXECUTIVE ORDER 13770

Pursuant to Section 1, Paragraph 6 of the Executive Order, I understand that I have ethics obligations with respect to any former employer during the preceding two years, as well as any organization in which I held a fiduciary duty. For purposes of this restriction, the entities that fall within the prohibition are DowDuPont, the National Association of Wabash Men, and the Lambda Chi Alpha Home Association of Wabash College.

I understand that I am prohibited from participating in any particular matter involving specific parties in which any of the entities listed below is a party or represents a party. My recusal lasts for two years from the date that I joined federal service. I have been advised by OGC/Ethics that, for the purposes of this pledge obligation, the term “particular matters involving specific parties” is broadened to include any meetings or other communication relating to the performance of my official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. I am further advised that the term “open to all interested parties” means five or more parties who represent a diversity of interests rather than one shared perspective.¹

NAME OF ENTITY	DATE WHEN RECUSAL ENDS
DowDupont, Inc.	July 8, 2020
National Association of Wabash Men, Board of Directors	July 8, 2020
Lambda Chi Alpha Home Association of Wabash College	July 8, 2020

ATTORNEY BAR OBLIGATIONS

Pursuant to my obligations under my bar rules, I recognize that I am obliged to protect the confidences of my former clients. I also understand that I cannot participate in any matter that is the same as or substantially related to the same specific party matter that I participated in

¹ I understand that such meetings “do not have to be open to every corner, but should include a multiplicity of parties. For example, if an agency is holding a meeting with five or more stakeholders regarding a given policy or piece of legislation, [then I] could attend such a meeting even if one of the stakeholders is a former employer or former client.” See Office of Government Ethics (OGE) Advisory DO-09-011 (3/26/09), which applies to Exec. Order 13770 pursuant to OGE Legal Advisory LA-17-03 (3/20/17).

personally and substantially while in private practice, unless my bar provides for and I first obtain informed consent and notify OGC/Ethics.

SUPERFUND SITES

To avoid any concerns about my ethical obligations, I am affirming that I will not participate in matters related to any of the sites on the attached list generated by the Office of Site Remediation and Enforcement. This list includes all of the Superfund sites at which DowDuPont Inc. is a potentially responsible party. Consistent with my attorney bar rules, I will not participate in any matter that I previously worked on personally and substantially. For any of the sites on the attached list that I did not previously work on personally and substantially, I will not participate in matters for those sites until after July 8, 2020, consistent with my obligations under the federal ethics regulations and Executive Order 13770.

SCREENING ARRANGEMENT

In order to ensure that I do not participate in matters relating to any of the entities listed above or Superfund sites on the attached list, I will instruct Barry Breen and/or Steven Cook, Deputy Assistant Administrators, to assist in screening EPA matters directed to my attention that involve those entities or sites. All inquiries and comments involving the entities or Superfund sites on my recusal list should be directed to Mr. Breen or Mr. Cook without my knowledge or involvement until after my recusal period ends.

If Mr. Breen or Mr. Cook determine that a particular matter will directly involve any of the entities or matters listed on my "specific party" recusal list, then they will refer it for action or assignment to another, without my knowledge or involvement. In the event that they are unsure whether an issue is a particular matter from which I am recused, then they will consult with OGC/Ethics for a determination. I will provide a copy of this memorandum to my principal subordinates with a copy to Kevin Minoli, Designated Agency Ethics Official, and Justina Fugh, Senior Counsel for Ethics.

UPDATE AS NECESSARY

In consultation with OGC/Ethics, I will revise and update my recusal statement whenever warranted by changed circumstances, including changes in my financial interests such as the sale of the above-mentioned stock, changes in my personal or business relationships, or any changes to my EPA duties. In the event of any changes, I will provide a copy of the revised recusal statement to you and OGC/Ethics.

cc: Ryan Jackson, Chief of Staff
Barry Breen, Deputy Assistant Administrator
Steven Cook, Deputy Assistant Administrator
Kevin Minoli, Designated Agency Ethics Official
Justina Fugh, Senior Counsel for Ethics

MAR - 7 2018

Mr. Kevin S. Minoli
Designated Agency Ethics Official
U.S. EPA (2310A)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Minoli:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Administrator for the Office of Land and Emergency Management of the United States Environmental Protection Agency.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with The Dow Chemical Company, a wholly owned subsidiary of DowDuPont, Inc. Within 90 days following my resignation, I will receive a severance payment from DowDuPont, Inc. The amount of the severance payment will be fixed as of the date of my termination with the company and the payment will be determined by an objective method in accordance with the company's standard policy for such payments. Following my resignation, I will receive a bonus for calendar year 2017, as is the corporation's practice. The Dow Chemical Company will use an objective formula to calculate this bonus. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of The Dow Chemical Company or DowDuPont, Inc. to provide these payments, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I own shares of DowDuPont, Inc. and I hold vested deferred shares and vested performance shares in DowDuPont, Inc. I do not hold stock options, restricted stock, or restricted stock units. Pursuant to company policy, DowDuPont, Inc. will accelerate the issue date of DowDuPont stock in connection with my deferred and performance shares and will release the stock to me within 30 days of my separation. Within 90 days of my confirmation, I will divest all of my stock in DowDuPont, Inc., to include any stock resulting from settlement of my deferred and performance shares. Until I have divested all of these financial interests, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and

predictable effect on the financial interests of The Dow Chemical Company or DowDuPont, Inc. or its subsidiaries unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

I will continue to participate in The Dow Chemical Company defined benefit pension plan, but will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of The Dow Chemical Company or DowDuPont, Inc. to provide this contractual benefit, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know The Dow Chemical Company or DowDuPont, Inc. or any of its subsidiaries is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my positions with the National Association of Wabash Men and the Lambda Chi Alpha Home Association of Wabash College. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of Assistant Administrator in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5

U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely yours,

A handwritten signature in black ink, consisting of several overlapping, stylized loops and strokes, positioned above the printed name.

Peter C. Wright

From: [Fugh, Justina](#)
To: [Breen, Barry](#)
Cc: [Thornton, Kecia](#); [Griffo, Shannon](#)
Subject: Peter Wright's recusal statement
Date: Tuesday, July 10, 2018 3:11:02 PM
Attachments: (b) (5)

Hi there,

(b) (5), OGC/Ethics assisted Mr. Wright by drafting the bare bones of a recusal statement or two (see attached). Now that he is an EPA employee,

(b) (5)

Shannon

Griffo of Team Ethics will draft his recusals, but can we work with you to get him to see if he has any questions and, if not, then get him to sign and issue the document?

Thanks in advance,

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Thornton, Kecia](#)
To: [Fugh, Justina](#)
Cc: [Griffo, Shannon](#); [Ross, Margaret](#)
Subject: Re: Peter Wright's recusal statement
Date: Thursday, August 02, 2018 2:02:07 PM

Great. Thank you!! I will follow up with him and circle back with you once I hear from him.
Take care!!

Kecia Thornton
OLEM/OMIS
(202) 566-1913

On Aug 2, 2018, at 2:00 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi Kecia,

For your records, here is the signed and dated recusal statement and attachment. Can you please ask Mr. Wright if (b) (5), (b) (6)

[REDACTED]

[REDACTED]

[REDACTED]

If so, then Margaret Ross, copied here, can assist him.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Thornton, Kecia
Sent: Thursday, August 02, 2018 9:27 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: FW: Peter Wright's recusal statement

Good morning, Justina!

I hope you are well. Do you have what you need from Peter on this for now or is there something you need us to do? Thank you!

Kecia
(202) 566-1913

From: Fugh, Justina

Sent: Tuesday, July 10, 2018 3:11 PM

To: Breen, Barry <Breen.Barry@epa.gov>

Cc: Thornton, Kecia <Thornton.Kecia@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: Peter Wright's recusal statement

Hi there,

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Shannon Griffo of Team Ethics will draft his recusals, but can we work with you to get him to see if he has any questions and, if not, then get him to sign and issue the document?

Thanks in advance,

Justina

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<Peter Wright Recusal 07 24 2018.pdf>

<Peter Wright Superfund List Attachment to Recusal.xlsx>




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

JUL 24 2018

MEMORANDUM

SUBJECT: Recusal Statement

FROM: Peter Wright 
Senior Advisor to the Administrator

TO: Andrew R. Wheeler
Acting Administrator

Upon consideration of my appointment, I consulted with the Office of General Counsel/Ethics (OGC/Ethics) and was advised about my ethics obligations. I have assiduously followed their advice since my appointment, and this memorandum formally notifies you of my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13770 and the Trump Ethics Pledge that I signed, as well as my own bar obligations.

FINANCIAL CONFLICTS OF INTEREST

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

As stated in my ethics agreement, I agreed to forfeit all DowDuPont, Inc. (DowDuPont) stock options that are unvested at the time of my resignation from DowDuPont and to divest of my vested stock options and stock in DowDuPont within 90 days of my federal appointment. I am currently working with OGC/Ethics to fulfill this commitment. Until I sell the stock, I

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Chemical industry sector	Continues for as long as I own stock in this sector.

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I understand that I am prohibited from participating in any particular matter involving specific parties in which any of the entities listed below is a party or represents a party. My recusal lasts for two years from the date that I joined federal service. I have been advised by OGC/Ethics that, for the purposes of this pledge obligation, the term “particular matters involving specific parties” is broadened to include any meetings or other communication relating to the performance of my official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. I am further advised that the term “open to all interested parties” means five or more parties who represent a diversity of interests rather than one shared perspective.¹

NAME OF ENTITY	DATE WHEN RECUSAL ENDS
DowDupont, Inc.	July 8, 2020
National Association of Wabash Men, Board of Directors	July 8, 2020
Lambda Chi Alpha Home Association of Wabash College	July 8, 2020

ATTORNEY BAR OBLIGATIONS

Pursuant to my obligations under my bar rules, I recognize that I am obliged to protect the confidences of my former clients. I also understand that I cannot participate in any matter that is the same as or substantially related to the same specific party matter that I participated in

¹ I understand that such meetings “do not have to be open to every corner, but should include a multiplicity of parties. For example, if an agency is holding a meeting with five or more stakeholders regarding a given policy or piece of legislation, [then I] could attend such a meeting even if one of the stakeholders is a former employer or former client.” See Office of Government Ethics (OGE) Advisory DO-09-011 (3/26/09), which applies to Exec. Order 13770 pursuant to OGE Legal Advisory LA-17-03 (3/20/17).

personally and substantially while in private practice, unless my bar provides for and I first obtain informed consent and notify OGC/Ethics.

SUPERFUND SITES

To avoid any concerns about my ethical obligations, I am affirming that I will not participate in matters related to any of the sites on the attached list generated by the Office of Site Remediation and Enforcement. This list includes all of the Superfund sites at which DowDuPont Inc. is a potentially responsible party. Consistent with my attorney bar rules, I will not participate in any matter that I previously worked on personally and substantially. For any of the sites on the attached list that I did not previously work on personally and substantially, I will not participate in matters for those sites until after July 8, 2020, consistent with my obligations under the federal ethics regulations and Executive Order 13770.

SCREENING ARRANGEMENT

In order to ensure that I do not participate in matters relating to any of the entities listed above or Superfund sites on the attached list, I will instruct Barry Breen and/or Steven Cook, Deputy Assistant Administrators, to assist in screening EPA matters directed to my attention that involve those entities or sites. All inquiries and comments involving the entities or Superfund sites on my recusal list should be directed to Mr. Breen or Mr. Cook without my knowledge or involvement until after my recusal period ends.

If Mr. Breen or Mr. Cook determine that a particular matter will directly involve any of the entities or matters listed on my "specific party" recusal list, then they will refer it for action or assignment to another, without my knowledge or involvement. In the event that they are unsure whether an issue is a particular matter from which I am recused, then they will consult with OGC/Ethics for a determination. I will provide a copy of this memorandum to my principal subordinates with a copy to Kevin Minoli, Designated Agency Ethics Official, and Justina Fugh, Senior Counsel for Ethics.

UPDATE AS NECESSARY

In consultation with OGC/Ethics, I will revise and update my recusal statement whenever warranted by changed circumstances, including changes in my financial interests such as the sale of the above-mentioned stock, changes in my personal or business relationships, or any changes to my EPA duties. In the event of any changes, I will provide a copy of the revised recusal statement to you and OGC/Ethics.

cc: Ryan Jackson, Chief of Staff
Barry Breen, Deputy Assistant Administrator
Steven Cook, Deputy Assistant Administrator
Kevin Minoli, Designated Agency Ethics Official
Justina Fugh, Senior Counsel for Ethics



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 30 2019

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

NOW THE
OFFICE OF LAND AND
EMERGENCY MANAGEMENT

MEMORANDUM

SUBJECT: Updated Recusal Statement

FROM: Peter Wright
Assistant Administrator

A handwritten signature in dark ink, appearing to read "P. Wright", is written over the name "Peter Wright" in the "FROM:" field.

TO: Andrew R. Wheeler
Administrator

I have consulted with the Office of General Counsel/Ethics (OGC/Ethics) and been advised about my ethics obligations. This memorandum formally notifies you of my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13770 and the Trump Ethics Pledge that I signed, as well as my own bar obligations. This recusal statement supersedes my July 24, 2018 recusal statement for my prior position as Senior Advisor.

FINANCIAL CONFLICTS OF INTEREST

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I have consulted with OGC/Ethics and been advised that I do not currently have any significant financial conflicts of interest but will remain vigilant and notify OGC/Ethics immediately should my financial situation change.

OBLIGATIONS UNDER EXECUTIVE ORDER 13770

Pursuant to Section 1, Paragraph 6 of the Executive Order, I understand that I have ethics obligations with respect to any former employer during the preceding two years, as well as any organization in which I held a fiduciary duty. For purposes of this restriction, the entities that fall within the prohibition are **Dow Inc.; DuPont de Nemours, Inc. (DuPont); Corteva¹; the National Association of Wabash Men; and the Lambda Chi Alpha Home Association of Wabash College.**

I understand that I am prohibited from participating in any particular matter involving specific parties in which any of the entities listed below is a party or represents a party. My recusal lasts for two years from the date that I joined federal service. I have been advised by OGC/Ethics that, for the purposes of this pledge obligation, the term "particular matters involving specific parties" is broadened to include any meetings or other communication relating to the performance of my official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. I am further advised that the term "open to all interested parties" means five or more parties who represent a diversity of interests rather than one shared perspective.²

NAME OF ENTITY	DATE WHEN RECUSAL ENDS
Dow Inc.	July 8, 2020
DuPont	July 8, 2020
Corteva, Inc. ³	July 8, 2020
National Association of Wabash Men, Board of Directors	July 8, 2020
Lambda Chi Alpha Home Association of Wabash College	July 8, 2020

ATTORNEY BAR OBLIGATIONS

Pursuant to my obligations under my bar rules, I recognize that I am obliged to protect the confidences of my former clients. I also understand that I cannot participate in any matter that is the same as or substantially related to the same specific party matter that I participated in personally and substantially while in private practice, unless my bar provides for and I first

¹ In 2019, DowDuPont separated into three independent companies: Dow, DuPont and Corteva. Although the creation of Corteva occurred after I left the company, I am nevertheless including it on my recusal list to avoid even the appearance of an ethics issue while I am the Assistant Administrator for OLEM.

² I understand that such meetings "do not have to be open to every corner, but should include a multiplicity of parties. For example, if an agency is holding a meeting with five or more stakeholders regarding a given policy or piece of legislation, [then I] could attend such a meeting even if one of the stakeholders is a former employer or former client." See Office of Government Ethics (OGE) Advisory DO-09-011 (3/26/09), which applies to Exec. Order 13770 pursuant to OGE Legal Advisory LA-17-03 (3/20/17).

³ Although OGC/Ethics does not anticipate that this company is likely to present any issues in OLEM, I am including it out of an abundance of caution.

obtain informed consent and notify OGC/Ethics.

SUPERFUND SITES

To avoid any concerns about my ethical obligations, I am affirming that I will not participate in any matters related to any Superfund sites at which my former employers are a potentially responsible party. Consistent with my attorney bar rules, I will not participate in any matter that I previously worked on personally and substantially. For any of the sites involving my former employers that I did not previously work on personally and substantially, I will not participate in matters for those sites until after July 8, 2020, consistent with my obligations under the federal ethics regulations and Executive Order 13770.

SCREENING ARRANGEMENT

In order to ensure that I do not participate in particular matters addressed in this recusal statement, I will instruct Barry Breen and/or Steven Cook, Deputy Assistant Administrators, to assist in screening EPA matters directed to my attention that involve those entities or sites. All inquiries and comments involving the entities or Superfund sites on my recusal list should be directed to Mr. Breen or Mr. Cook without my knowledge or involvement until after my recusal period ends.

If Mr. Breen or Mr. Cook determine that a particular matter will directly involve any of the entities or matters listed on my "specific party" recusal list, then they will refer it for action or assignment to another, without my knowledge or involvement. In the event that they are unsure whether an issue is a particular matter from which I am recused, then they will consult with OGC/Ethics for a determination. I will provide a copy of this memorandum to my principal subordinates with a copy to the Designated Agency Ethics Official and the Alternate Designated Agency Ethics Official.

UPDATE AS NECESSARY

In consultation with OGC/Ethics, I will revise and update my recusal statement whenever warranted by changed circumstances, including changes in my financial interests such as the sale of the above-mentioned stock, changes in my personal or business relationships, or any changes to my EPA duties. In the event of any changes, I will provide a copy of the revised recusal statement to you and OGC/Ethics.

cc: Ryan Jackson, Chief of Staff
Barry Breen, Deputy Assistant Administrator
Steven Cook, Deputy Assistant Administrator
David Cozad, Acting Designated Agency Ethics Official
Justina Fugh, Alternate Designated Agency Ethics Official